

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

FILED

OCT 19 2015

Phil Lombardi, Clerk
U.S. DISTRICT COURT

LINDSEY KENT SPRINGER,

Plaintiff,

v.

(1) UNITED STATES ATTORNEY FOR THE
NORTHERN DISTRICT OF OKLAHOMA, Danny
C. Williams, Sr., Officially; et al.,

Defendants.

Case No. 15-CV-142-JED-FHM

MOTION FOR LIMITED DISCOVERY

Lindsey Kent Springer ("Plaintiff") moves the Court for an order allowing limited discovery on Cathryn D. McClanahan's appointment by the Attorney General personally.

Ms. McClanahan and Mr. Williams have stated as officers of this Court that Ms. McClanahan was appointed by the Attorney General personally having never mentioning the Attorney General's name and when the appointment was made.

Plaintiff made a Freedom of Information Act ("FOIA") on Ms. McClanahan's purported appointment the moment she entered her appearance for the Defendants and EOUSA has failed to respond and the time period to do so has long expired. Doc. 53 and Exhibit 48.

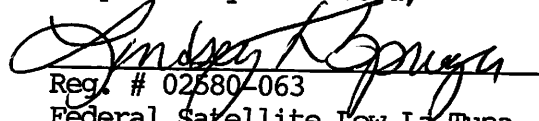
Plaintiff has clearly rebutted the presumption that Ms. McClanahan holds the Northern District of Oklahoma office of Assistant United States Attorney. However, Ms. McClanahan continues to rely solely upon her sayso when that sayso is overborn with clear evidence EOUSA has no such record Ms. McClanahan is appointed by the Attorney General personally and as required by 28 U.S.C. § 542. This entire case is based upon the sayso of Mr. Williams and others and the time has come for this Court to test Ms. McClanahan's sayso.

Ms. McClanahan needs a current appointment by the current Attorney General personally and only and Plaintiff requests this Court issue an order directly Ms. McClanahan provide a copy of her original appointment from the current Attorney General, to both Plaintiff and the Court's record.

CONCLUSION

Plaintiff respectfully requests this Court enter an order directing Ms. McClanahan and Mr. Williams provide to both Plaintiff and this Court a true and correct copy of Ms. McClanahan's appointment to the Article II, § 2, Cl. 2 office of Assistant United States Attorney by the current Attorney General personally, and any other appointment Ms. McClanahan received from former Attorney General Eric H. Holder, Jr., within 10 days of the Court's Order.

Respectfully Submitted,


Reg. # 02580-063
Federal Satellite Low-La Tuna
P.O. Box 6000
Anthony, New Mexico 88021

CERTIFICATE OF SERVICE

I hereby certify that on ~~September~~ ^{October} 14, 2015, I mailed by U.S. Postal First Class the above Motion to the Clerk of Court, 333 West Fourth Street, Tulsa, Oklahoma 74103:

I further certify that all parties are registered ECF users and the following shall receive service of this Motion through the Court's ECF system;

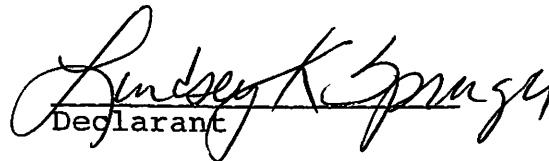
Danny C. Williams, Sr.
Eric H. Holder, Jr.
Susan B. Gerson
Sean R. O'Neill
Carmen M. Banerjee

Through Cathryn D. McClanahan
Counsel for all Defendants


Server

DECLARATION OF MAILING

I declare under the penalty of perjury pursuant to 28 U.S.C. Section 1746(1), under the laws of the United States of America, that on ~~September~~ ^{October} 14, 2015, I deposited the above Motion in the U.S. Mail Box located inside FSL La Tuna to the address listed above.


Declarant